

**Langlois, Jennifer**

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**From:** Davidson, Clifford  
**Sent:** Tuesday, May 23, 2023 4:40 PM  
**To:** Ron Downs; Eyman, Drew  
**Cc:** Tonya Grass  
**Subject:** RE: Miller v Columbia 911  
**Attachments:** 003202.pdf

Hi, Ron. Thanks for your patience. Tyler's other attorney has not received Facebook materials concerning Tyler other than the attached. Is Ms. Egan willing to respond to the subpoena consistent with the narrowing we proposed? He also does not have documents responsive to the other document demands attached to the subpoena to Ms. Egan.

[REDACTED]

Thank you,  
Cliff

**Clifford S. Davidson** (he/him/his)

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[csdavidson@swlaw.com](mailto:csdavidson@swlaw.com)

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**From:** Ron Downs <[rdowns@sdao.com](mailto:rdowns@sdao.com)>  
**Sent:** Monday, May 22, 2023 12:09 PM  
**To:** Davidson, Clifford <[csdavidson@swlaw.com](mailto:csdavidson@swlaw.com)>; Eyman, Drew <[deyman@swlaw.com](mailto:deyman@swlaw.com)>  
**Cc:** Tonya Grass <[tgrass@sdao.com](mailto:tgrass@sdao.com)>  
**Subject:** RE: Miller v Columbia 911

[EXTERNAL] [rdowns@sdao.com](mailto:rdowns@sdao.com)

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Mr. Davidson:

Thank you for getting back to me. Regarding Ms. Egan, it is my understanding that the Facebook related information has been provided in either this case or the companion case *Miller v Watson*. Please let me know if this is correct. As an aside, it is my understanding that Ms. Egan does not believe she has much if anything in the way of Facebook.

[REDACTED]

I understand that some of these issues may have come up in the companion case. I am not sure who Mr. Miller's counsel was/is in this case, but some of the discovery may have been produced. Just a thought.

Ron

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**From:** Davidson, Clifford <[csdavidson@swlaw.com](mailto:csdavidson@swlaw.com)>  
**Sent:** Friday, May 19, 2023 8:46 AM  
**To:** Ron Downs <[rdowns@sdao.com](mailto:rdowns@sdao.com)>; Eyman, Drew <[deyman@swlaw.com](mailto:deyman@swlaw.com)>  
**Cc:** Tonya Grass <[tgrass@sdao.com](mailto:tgrass@sdao.com)>  
**Subject:** RE: Miller v Columbia 911

Good morning, Mr. Downs and Ms. Grass. Regarding the Egan subpoena, we propose to modify category 2 of the document demand to request all Facebook posts, private messages, Messenger messages, or other communications on the Facebook platform, mentioning or regarding Tyler Miller. We hope that will resolve the motion.

[REDACTED]

Thank you,  
Cliff

**Clifford S. Davidson** (he/him/his)%

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**From:** Ron Downs <[rdowns@sdao.com](mailto:rdowns@sdao.com)>  
**Sent:** Thursday, May 18, 2023 1:19 PM  
**To:** Eyman, Drew <[deyman@swlaw.com](mailto:deyman@swlaw.com)>; Davidson, Clifford <[csdavidson@swlaw.com](mailto:csdavidson@swlaw.com)>  
**Cc:** Tonya Grass <[tgrass@sdao.com](mailto:tgrass@sdao.com)>  
**Subject:** Re: Miller v Columbia 911

[EXTERNAL] [rdowns@sdao.com](mailto:rdowns@sdao.com)

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Thank you Drew.

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**From:** Eyman, Drew <[deyman@swlaw.com](mailto:deyman@swlaw.com)>  
**Sent:** Thursday, May 18, 2023 1:16:16 PM  
**To:** Ron Downs <[rdowns@sdao.com](mailto:rdowns@sdao.com)>; Davidson, Clifford <[csdavidson@swlaw.com](mailto:csdavidson@swlaw.com)>  
**Cc:** Tonya Grass <[tgrass@sdao.com](mailto:tgrass@sdao.com)>  
**Subject:** RE: Miller v Columbia 911

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Hi Ronald,

Thanks for reaching out. We will talk to our client and get back to you by tomorrow morning.

**Drew Eyman**

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**From:** Ron Downs <[rdowns@sdao.com](mailto:rdowns@sdao.com)>  
**Sent:** Thursday, May 18, 2023 8:44 AM  
**To:** Davidson, Clifford <[csdavidson@swlaw.com](mailto:csdavidson@swlaw.com)>; Eyman, Drew <[deyman@swlaw.com](mailto:deyman@swlaw.com)>  
**Cc:** Tonya Grass <[tgrass@sdao.com](mailto:tgrass@sdao.com)>  
**Subject:** Miller v Columbia 911

**[EXTERNAL]** [rdowns@sdao.com](mailto:rdowns@sdao.com)

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Dear Mr. Davidson and Mr. Eyman:

I just left a message for Clifford. I have been retained by Michael Fletcher and Chandra Egan to represent them relative to your SDT. To that end, I am preparing a motion to quash the SDT served on both clients. A copy of the DRAFT motion is attached.

If you could either give me a call or respond to this email, I would appreciate it. I understand that there may some urgency to get this filed, so if I do not hear from you by tomorrow, I will need to proceed with filing.

This email reflects my attempt to confer on the matters related to your SDT. Please let me know your position and/or if you would like to discuss.

Thank you,  
Ronald Downs

**Langlois, Jennifer**

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**From:** Ron Downs <rdowns@sdao.com>  
**Sent:** Monday, July 24, 2023 9:42 AM  
**To:** Davidson, Clifford; Eyman, Drew  
**Cc:** Tonya Grass; Karen O'Kasey  
**Subject:** RE: SDT to Fletcher

[EXTERNAL] rdowns@sdao.com

I understand Clifford. You need to do what you need to do. My client is allowed to seek outside assistance if necessary to comply with your SDT. She certainly is not required to pay for this assistance and since your client is unwilling to pay the estimated costs, we are unable to move forward. You are familiar with Judge Beckerman's well written opinion on such requests. His opinion is consistent with how I have handled these matters in the past. Please let me know if your position changes. Otherwise, I will wait for your motion to compel.

Ron

-----Original Message-----

From: Davidson, Clifford <csdavidson@swlaw.com>  
Sent: Tuesday, July 18, 2023 11:22 PM  
To: Ron Downs <rdowns@sdao.com>; Eyman, Drew <deyman@swlaw.com>  
Cc: Tonya Grass <tgrass@sdao.com>; Karen O'Kasey <KOK@hartwagner.com>  
Subject: Re: SDT to Fletcher

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Hi, Ron. I hope all is well. I have not heard from you on this. Please let me and Drew know your intentions regarding Ms. Egan's documents. If we don't either hear from you, or receive a production, by close of business next Thursday, July 27, then we will need to take this matter up with the court.

Thank you,  
Cliff

On Jun 30, 2023, at 12:37 PM, Davidson, Clifford <csdavidson@swlaw.com> wrote:

Hi, Ron. Tyler does not agree to pay the expense associated with downloading her profile and reviewing it for contents pertaining to or mentioning Tyler. She can download it and provide it to you for your office to review using whatever discovery tools you typically use to review documents for discovery purposes. For example, someone could print the contents of the downloaded profile as a searchable PDF and review that way. Here is a screenshot from <https://www.facebook.com/help/212802592074644>; HTML format might be the way to go:

<image001.png>

Alternatively, you can send us the HTML download of her profile and we will agree to treat it as attorney eyes only except to the extent it relates to Tyler. We would let you know first what we deem to fall under that category to give

you a chance to object prior to removing the attorney eyes only designation.

Please let me know by July 3 whether you are willing to proceed in one of these ways, otherwise we'll need to raise the issue with the court.

Thanks,  
Cliff

Clifford S. Davidson (he/him/his)

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From: Ron Downs <rdowns@sdao.com>

Sent: Tuesday, June 27, 2023 10:01 AM

To: Davidson, Clifford <csdavidson@swlaw.com>; Eyman, Drew <deyman@swlaw.com>

Cc: Tonya Grass <tgrass@sdao.com>; Karen O'Kasey <KOK@hartwagner.com>; Chandra Egan <cegan@columbia911.com>

Subject: RE: SDT to Fletcher

[EXTERNAL] rdowns@sdao.com<mailto:rdowns@sdao.com>

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Clifford and Drew:

Novitas sent me the following estimate for performing the search of Ms. Egan's Facebook account.

"\$2500 for the timeline collection, and \$350 per hour for manual search of text threads and photos."

Drew, you asked if Ms. Egan has tried to do the search herself. She has and was only able to find one post. If more exists, it is beyond her capability.

With that said, please let me know if you wish to proceed with having Novitas pull the data. A condition of this search will require confirmation that you are willing to pay any associated costs or estimates. Given the nature of this search, I would ask that Novitas is paid up front for their timeline collection and for an additional amount for time conducting the manual search. If you agree, I will ask for what they would require upfront.

Thank you,

Ron Downs

From: Ron Downs

Sent: Thursday, June 22, 2023 3:04 PM

To: Davidson, Clifford <csdavidson@swlaw.com<mailto:csdavidson@swlaw.com>>; Eyman, Drew <deyman@swlaw.com<mailto:deyman@swlaw.com>>

Cc: Tonya Grass <tgrass@sdao.com<mailto:tgrass@sdao.com>>; Karen O'Kasey  
<KOK@hartwagner.com<mailto:KOK@hartwagner.com>>  
Subject: SDT to Fletcher

Clifford and Drew:

See attached letter from Ron Downs regarding Michael Fletcher. Please feel free to give me a call if you have any questions.

Ron